

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

**DEBRA MOORE and GAIL  
MACMURRAY, Individually, And In A  
Representative Capacity For All Persons  
Identified By RSMo. 573.080**

**Plaintiffs.**

**v.**

**WORTH COUNTY NURSING HOME  
DISTRICT D/B/A WORTH COUNTY  
CONVALESCENT CENTER**

**and**

**BEVERLY MILLER**

**and**

**JENNIFER RUNNELS**

**and**

**AMRIT P. SINGH, MD**

**Defendants.**

**Case No.: 5:16-cv-06120**

**JURY TRIAL DEMAND**

**NOTICE OF DISMISSAL WITHOUT PREJUDICE**

Plaintiffs move to dismiss this matter without prejudice. To date, no Defendant has answered the complaint nor filed a motion for summary judgment. Therefore, dismissal without prejudice is appropriate under Federal Rule of Civil Procedure 41(a)(1)(A)(i).

WHEREFORE, Plaintiffs request that the Court dismiss this matter without prejudice.

Respectfully submitted,

THE STEELE LAW FIRM

/s/ Jonathan Steele

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*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Notice of Dismissal was filed electronically on the 11th day of November, 2016, with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following:

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WORTH COUNTY NURSING HOME DISTRICT,  
BEVERLY MILLER AND JENNIFER RUNNELS**

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